

# COVID-19 Compensation Documentation for Transitioned Physicians

PYA's [Stark Law Blanket Waiver Documentation Checklist](#) may provide sufficient record for maintaining appropriate physician resources for coverage and care provision during the COVID-19 pandemic. However, depending on a healthcare organization's specific facts and circumstances, other documentation may be required. As such, PYA has developed the following form, which may serve to help support an appropriate record regarding the provision of COVID-19-related physician services.

Physician Name \_\_\_\_\_

Date Form Completed \_\_\_\_\_

## 1. Physician Classification

Employed	Medical Director	Administrative (i.e., Medical Staff Officer)
Independent Contractor	Teaching Physician	Other

## 2. Role Prior to Public Health Emergency (PHE)

Specialty \_\_\_\_\_

All Organizational Roles (Including Department/Area of Service)  
\_\_\_\_\_

Responsibilities

Clinical

Administrative

Other \_\_\_\_\_

Total Compensation \_\_\_\_\_

Compensation Structure  
(i.e., base plus productivity  
bonus, hourly rate, etc.)

## 3. New/Revised Role During PHE

Transition Date \_\_\_\_\_

Rationale for Physician's Transition  
\_\_\_\_\_

Department/Area of Service \_\_\_\_\_

Services Currently  
Provided by Physician

Clinical

Administrative

Other \_\_\_\_\_

Compensation Structure (i.e., base plus productivity bonus, hourly rate, etc.)

### 3. New/Revised Role During PHE continued

Physicians Providing Services in Multiple Departments/Areas

#### Allocation of Hours per Month

Department/Area _____  Anticipated _____ Actual _____ _____  Responsibilities of Transitioned Physician  Anticipated    Actual	If Needed, Second Department/Area _____  Anticipated _____ Actual _____ _____  Responsibilities of Transitioned Physician  Anticipated    Actual
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### 4. New/Revised Role Conclusion

End Date \_\_\_\_\_

Rationale for End Date

*Was the need for services terminated prior to/extended beyond the declared end of the PHE? If so, why?*

### 5. Documentation

#### A. Business Rationale

Documentation has been developed describing the business rationale of the role in which the physician will serve and/or services he/she will provide related to COVID-19.

#### B. Amendment

Documentation has been developed demonstrating that the previous agreement has been amended for the new role and/or services.

### 6. Agreement

A signed agreement has been appropriately executed to describe the new role and/or services the physician will provide.

Provider  
Legal Counsel

*The information provided herein is of a general nature and cannot be substituted for the advice of a professional opinion in which specialized knowledge is applied to a particular circumstance. Therefore, nothing in this aid should be construed to offer or render a professional opinion, and PYA cannot take any responsibility for an attempt to use or adopt the information presented therein.*